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TFVIOL HHANDLER -----	ENFOR DATE -----	ENFOR TYPE -----	VIOL NUM -----	DATE DET -----
BOYERTOWN SANITARY DISPOS	11/12/1996	120	S0023	05/04/95
			S0019	07/26/94
	03/25/1997	510	S0030	10/23/95
			S0029	10/23/95
			S0028	03/17/95
			S0027	04/25/95
			S0026	03/23/95
			S0024	03/17/95
			S0023	05/04/95
			S0022	03/17/95
			S0020	08/18/93
			S0019	07/26/94
			S0017	07/26/94

END OF REPORT

MORE ==>



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

- Please note our new name -

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DEP

Suite 6010 Lee Park
555 North Lane
Conshohocken, PA 19428
August 17, 1995

Certified Return Receipt # P303100819

(610) 832-6212
Fax: (610) 832-6259

Southeast Regional Office
Waste Management Program

NOTICE OF INTENT TO FORFEIT BOND

NOTICE OF VIOLATION

Mr. Warren Frame
President
Boyertown Sanitary Disposal Co., Inc.
1205 Pottstown Pike
Glenmoore, PA 19343

RE: Irrevocable Letter of Credit # 79480,
dated Sept. 3, 1987
Held by Boyertown Sanitary Disposal
Co., Inc.
Permit # 100550
Boyertown Landfill
300 Merkel Road
Gilbertsville
Montgomery County

Dear Mr. Frame:

This letter serves as Notice of Violation and as Notice of
Intent to Forfeit the bond for the above referenced facility.

Department inspections have revealed that Boyertown Sanitary
Disposal Co., Inc. ('B.S.D.') is operating in violation of the Clean
Streams Law, Act of June 22, 1937, P.L. 1987, as amended, 35 P.S.



\$691.1 et seq., ("CSL"); the Pennsylvania Solid Waste Management Act, Act of July 7, 1980, P.L. 380, as amended, 35 P.S. §6018.101, et. seq., ("SWMA"); the Rules and Regulations promulgated thereunder, and the conditions of Solid Waste Permit #100550 as follows:

A. B.S.D. failed to conduct groundwater monitoring at the Boyertown Landfill ("landfill") for the four quarters of 1993, four quarters of 1994, and the first two quarters of 1995; a total of 10 groundwater monitoring events which were not carried out. This is contrary to 25 Pa. Code §§ 265.92(e)(2), 273.284, 273.201(c), and condition number 2 of the Department's Solid Waste Management Permit No. 100550 amended 1/20/81.

B. Locking caps and identification numbers were observed to not be in place on two groundwater monitoring wells located on the landfill, contrary to 25 Pa. Code §§ 265.91(d), and 273.283(b)(4) and (6). In particular, an unlabelled and unlocked well was observed located on the north side of the landfill's leachate treatment plant, and monitoring well #9 was observed to have no lock.

C. Inspections conducted by the Department at the landfill on March 8, 17, 22, 23, April 3, 13, 25, May 2 and 4, 1995 revealed that B.S.D. failed to maintain two feet of freeboard in the raw leachate surface impoundment as a means to prevent any overtopping of the dike by overfilling, wave action or a storm. This is contrary to 25 Pa. Code §265.222.

D. An inspection conducted by the Department at the landfill on March 17, 1995 revealed:

1.) Raw leachate from the surface impoundment was overflowing the berm of the lagoon onto the ground, and posing a threat to Minister Creek, a water of the Commonwealth. This is contrary to 25

Pa. Code §§ 265.222, 101.2, 101.3, and constitutes unpermitted disposal of hazardous waste pursuant to 25 Pa. Code §270.1(a).

2.) B.S.D. failed to notify the Department of the hazardous waste leachate spill, contrary to 35 P.S. §§ 6018.403(b)(12), and 25 Pa. Code §§ 101.2 and 262.46 (a).

3.) Leachate seeps on the north slope of the landfill had flowed into stormwater swales which led to the onsite stormwater sedimentation pond, and to Minister Creek, a water of the Commonwealth. This is contrary to 25 Pa. Code §§ 273.272(a), 101.2, and 101.3, and constitute unpermitted disposal of hazardous waste pursuant to 25 Pa. Code §270.1(a).

E. A Department Order issued to B.S.D. on March 22, 1995, cited B.S.D.'s failure to maintain two feet of freeboard in the hazardous waste surface impoundment used for the collection of raw, untreated leachate thereby causing, and continuing to threaten to cause, an unpermitted discharge of leachate onto and into the surface of the ground and waters of the Commonwealth, a violation of 25 Pa. Code §§265.222, 101.2, 101.3(a), and 35 PS §§6018.401(a). This condition constitutes a public nuisance pursuant to 35 PS § 6018.601, and constitutes unlawful conduct pursuant to 35 PS §6018.403 (b)(9), 6018.610 (1),(2),(4) and (9), and 35 PS §691.611.

F. The Department's March 22 Order required B.S.D. to achieve and maintain a minimum freeboard of two feet in the leachate surface impoundment within 24 hours of service of the order. Department inspections conducted on March 23, April 3, April 13, April 19, April 25, May 2, and May 4, 1995 revealed that compliance with the Department's March 22 Order had not been attained. Two feet of freeboard was not attained in the raw leachate lagoon. This is contrary to 35 P.S. § 6018.603.

The activities and conditions described in paragraphs A through F above constitute a public nuisance pursuant to 35 P.S. §§ 691.307(c), 691.503, and 6018.601, constitutes unlawful conduct pursuant to 35 P.S. §§ 6018.403(a), (b)(9), (b)(11), 610(1), (4), (9), and § 691.611, subjects the offender to forfeiture of the bond pursuant to 35 P.S. § 6018.505(d), and subjects the offender to civil penalty liability pursuant to 35 P.S. § 6018.605.

These violations have existed for an extended period of time, and B.S.D. has failed to correct them as requested in Administrative meetings between the Department and B.S.D., on December 11, 1992 and November 22, 1994; as requested in Notices of Violation dated January 4, and September 7, 1994; as requested in inspection reports dated August 18, 1993, and July 26, 1994; and as requested in the March 22, 1995 Order.

In order to come into compliance with the SWMA, the CSL, the regulations promulgated thereunder, and the conditions of the Department's Solid Waste Permit No. 100550, the following corrective actions are recommended:

1. B.S.D. should immediately resume groundwater monitoring of the monitoring wells located at the landfill. Quarterly monitoring should be reported on the enclosed Form 19 Subtitle D. Analytical results of the groundwater sampling should be forwarded to the Department's Waste Management Program to the attention of the Solid Waste Operations Manager, 555 North Lane, Suite 6010, Conshohocken, Pa 19428.

2. B.S.D. should immediately achieve and maintain a minimum freeboard of two feet in the raw, untreated hazardous waste leachate surface impoundment.

3. B.S.D. should prepare and submit a written closure plan which addresses the following:

- a. Capping the uncapped portions of the landfill,
- b. Closure of the raw leachate surface impoundment in conjunction with the implementation of the use of storage tanks for the pretreatment storage of raw leachate,
- c. An evaluation of the adequacy and effectiveness of the existing gas management system, and
- d. An evaluation of the adequacy and effectiveness of the existing stormwater management system.

4. B.S.D. should ensure that all monitoring wells located at the landfill are fitted with locked caps and identification numbers.

Individual owners of Boyertown Landfill, whether they be corporate officials or individuals, may be responsible to ensure that the prescribed corrective actions be taken. If the bond is declared forfeited by the Department, the owners and/or corporate officers may be individually responsible for civil penalties resulting from the violations.

Unless the violations set forth above are corrected within thirty (30) days, the Department may take action to declare a forfeiture of the bond under the provisions of Section 505(d) of the SWMA. Declaration of Bond Forfeiture may cause suspension of your Waste Management permit and may cause other existing permits or certifications to be suspended or revoked.

This document is intended as a Notice. It is not intended to make factual or legal determinations, nor is it intended to be a final Department action.

If you have any questions, please contact me at the number above.

Sincerely,

A handwritten signature in black ink, appearing to read "RCC Furlan", written over the word "Sincerely,".

Ronald C. Furlan, P.E.
Regional Solid Waste Manager
Southeast Regional Office

cc: Division of Enforcement, C.O.
Certif., Licensing, and Bonding
MidLantic Bank
Kenneth Gelburd, Esquire
Mr. Bruce Beitler
Mr. Robert France
Mr. Robert Bauer
Douglass Township
John Bradley, Esquire



2540-PM-LRWM0041 7/95

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Coordination #

FORM 19
MUNICIPAL WASTE LANDFILL
QUARTERLY AND ANNUAL WATER QUALITY ANALYSES

This form must be fully and accurately completed.
All required information must be typed or
legibly printed in the spaces provided herein.

DER USE ONLY

Application or Facility ID # _____
(Assigned by DER)
Stamp Date Application Received**SECTION A. APPLICANT IDENTIFIER**

Applicant's Name _____

SECTION B. FACILITY INFORMATIONGeneral Reference: Section 273.284
Federal Regulations, Subtitle D: 258.54 and Appendix I to Part 258.

Monitoring wells must be designed and constructed in accordance with Department standards. INDICATE THE LATITUDE AND LONGITUDE TO THE NEAREST ONE TENTH OF A SECOND (DD° MM' SS.S").

Facility Name: _____

Monitoring Point Number: _____

___ Well ___ Spring ___ Stream ___ Other

___ Upgradient ___ Downgradient

Location: County _____

Municipality: _____

Sampling Point: Latitude: ____° ____' ____"

Longitude: ____° ____' ____"

Depth to Water Level: _____ ft.

Measured from: ___ Land Surface ___ TOC

Casing Stick Up: _____ ft.

Elevation of Water Level: _____ ft./MSL

Sampling Depth: _____ ft.

Volume of Water Column _____ gal.

Well Purged: ___ Yes ___ No

Sampling Method: ___ Pumped ___ Bailed ___ Grab

Sample Filtered: ___ Yes ___ No

Well Volumes Purged: _____

Spring Flow Rate: _____ GPM

Filter Pore Size: _____ microns

Sample Date (mm/dd/yy) _____

Sample Collection Time: _____

Sample Collector's Name: _____

Sample Collector's Affiliation: _____

Laboratory Performing Analysis: _____

Lab Sample Number: _____

Lab Analysis Date: _____

Comments: _____

I.D. No. _____
 Monitoring Point No. _____
 Sample Date _____

FORM 19
QUARTERLY AND ANNUAL WATER QUALITY ANALYSES

ANALYTES

1. Inorganics (Enter all data in mg/l except as noted)

STORET NO.	ANALYTE	VALUE†	ANALYSIS METHOD NUMBER
1. (00610)	Ammonia-Nitrogen		
2. (00340)	Chemical Oxygen Demand		
3. (00940)	Chloride		
4. (00980)	Iron (µg/l) Total		
5. (01123)	Manganese (µg/l) Total		
6. (00620)	Nitrate-Nitrogen		
7. (00403)	pH (standard units)	* Field	
8.		* Laboratory	
9. (00923)	Sodium Total		
10. (00095)	Specific Conductance (µmhos/cm)	* Field	
11.		* Laboratory	
12. (00680)	Total Organic Carbon		
13. (32730)	Total Phenolics (µg/l)		
14. (82079)	Turbidity (NTU) #		

- * Indicator Analyte - For comparison with detection zone analytes.
- † Please indicate detection limit if analyte is not detected.
- # If greater than 5.0 NTU, explain cause.

I.D. No. _____
 Monitoring Point No. _____
 Sample Date _____

FORM 19
QUARTERLY AND ANNUAL WATER QUALITY ANALYSES

2. Organics (Enter all data in µg/l)

STORET NO.	ANALYTE	VALUE	ANALYSIS METHOD NUMBER
15. (78124)	Benzene h		
16. (77651)	1,2-Dibromoethane h		
17. (34496)	1,1-Dichloroethane h		
18. (34501)	1,1-Dichloroethene h		
19. (34531)	1,2-Dichloroethane h		
20. (77093)	Cis-1,2-Dichloroethene h		
21. (34546)	Trans-1,2-Dichloroethene h		
22. (34371)	Ethyl Benzene h		
23. (34423)	Methylene chloride h		
24. (34475)	Tetrachloroethene h		
25. (78131)	Toluene h		
26. (34506)	1,1,1-Trichloroethane h		
27. (39180)	Trichloroethene h		
28. (39175)	Vinyl chloride h		
29. (81551)	Xylene h		

h - analytes subject to periodic statistical analyses.

I.D. No. _____
 Monitoring Point No. _____
 Sample Date _____

FORM 19
ANNUAL WATER QUALITY ANALYSES

1. Inorganics (Enter all data in mg/l)

STORET NO.	ANALYTE	VALUE	ANALYSIS METHOD NUMBER
30. (00951)	Fluoride		
31. (00945)	Sulfate		
32. (00410)	Total Alkalinity		

2. Metals (Enter all data in µg/l) If initial background analyses or four consecutive annual analyses show essentially identical (within 5%) dissolved and total analyses, dissolved analyses are not required.

STORET NO.	ANALYTE	VALUE	ANALYSIS METHOD NUMBER
33. (00978)	Arsenic, Total h		
34. (01000)	Arsenic, Dissolved		
35. (01009)	Barium, Total h		
36. (01005)	Barium, Dissolved		
37. (01113)	Cadmium, Total h		
38. (01025)	Cadmium, Dissolved		
39. (01118)	Chromium, Total		
40. (01030)	Chromium, Dissolved		
41. (01119)	Copper, Total		
42. (01040)	Copper, Dissolved		
43. (01114)	Lead, Total h		
44. (01049)	Lead, Dissolved		
45. (00921)	Magnesium, Total		
46. (00925)	Magnesium, Dissolved		
47. (71901)	Mercury, Total h		
48. (71890)	Mercury, Dissolved		
49. (00939)	Potassium, Total		
50. (00935)	Potassium, Dissolved		
51. (00981)	Selenium, Total h		
52. (01145)	Selenium, Dissolved		
53. (01079)	Silver, Total h		
54. (01075)	Silver, Dissolved		
55. (01094)	Zinc, Total		
56. (01090)	Zinc, Dissolved		

h - analytes subject to periodic statistical analyses.

I.D. No. _____
 Monitoring Point No. _____
 Sample Date _____

FORM 19
ANNUAL WATER QUALITY ANALYSES

3. Organics (Enter all data in µg/l)

STORET NO.	ANALYTE	VALUE	ANALYSIS METHOD NUMBER
57. (32104)	Bromoform (Tribromomethane) h		
58. (34413)	Bromomethane (Methyl Bromide) h		
59. (32102)	Carbon tetrachloride h		
60. (34301)	Chlorobenzene h		
61. (34311)	Chloroethane (Ethyl Chloride) h		
62. (32105)	Dibromochloromethane (Chlorodibromomethane) h		
63. (34418)	Methyl Chloride (Chloromethane) h		
64. (78109)	3-Chloro-1-propene h		
65. (34536)	1,2-Dichlorobenzene (o-Dichlorobenzene) h		
66. (34566)	1,3-Dichlorobenzene (m-Dichlorobenzene)		
67. (34571)	1,4-Dichlorobenzene (p-Dichlorobenzene) h		
68. (34668)	Dichlorodifluoromethane		
69. (34531)	x, y-Dichloropropane (Propylene Dichloride) h		
70. (34704)	Cis-1, 3-Dichloropropene h		
71. (34699)	Trans-1, 3-Dichloropropene h		
72. (81595)	Methyl Ethyl Ketone (2-Butanone) h		
73. (78133)	4-Methyl-2-pentanone (Methyl Isobutyl Ketone) h		
74. (77562)	1,1,1,2-Tetrachloroethane h		
75. (34516)	1,1,2,2-Tetrachloroethane h		
76. (34511)	1,1,2-Trichloroethane h		
77. (34488)	Trichlorofluoromethane (CFC-11) h		
78. (77443)	1,2,3-Trichloropropane h		

h - analytes subject to periodic statistical analyses.

I.D. No. _____
 Monitoring Point No. _____
 Sample Date _____

FORM 19
ANNUAL WATER QUALITY ANALYSES

When the MCL of any VOC is exceeded in the detection zone Form 50 monitoring, the following analytes must be monitored quarterly in the groundwater monitoring wells.

SUBTITLE D - Detection Zone Add-On List - Required only when Form 50 detection zone concentrations exceed MCLs.

STORET NO.	ORGANICS	VALUE	ANALYSIS METHOD NUMBER
79. (81552)	Acetone h		
80. (34215)	Acrylonitrile h		
81. (73085)	Bromochloromethane (Chlorobromomethane) h		
82. (32101)	Bromodichloromethane (Dichlorobromomethane) h		
83. (77041)	Carbon Disulfide h		
84. (32106)	Chloroform (Trichloromethane) h		
85. (38437)	1,2-Dibromo-3-Chloropropane (DBCP) h		
86. (77268)	trans-1,4-Dichloro-2-Butene h		
87. (77103)	Methyl butyl ketone (2-Hexanone) h		
88. (77956)	Methylene bromide (Dibromomethane) h		
89. (77424)	Methyl iodide (Iodomethane) h		
90. (81708)	Styrene h		
91. (39175)	Vinyl Acetate h		

METALS

92. (01268)	Antimony, Total	h		
93. (00998)	Beryllium, Total	h		
94. (00979)	Cobalt, Total	h		
95. (01074)	Nickel, Total	h		
96. (00982)	Thallium, Total	h		
97. (00985)	Vanadium, Total	h		

h - analytes subject to periodic statistical analyses.

NOIF CC's

1. Leon Kuchinski
Cheif, Division of Hazardous Waste Management
Bureau of Land Recycling and Waste Management
Rachel Carson State Office Building
P.O. Box 8471
Harrisburg, PA 17105-8471
2. Ms. Kathey Keyes
Division of Certification, Licensing and Bonding
1st Floor, Room 102
Rachel Carson State Office Building
Harrisburg, PA 17105-2063
3. MidLantic Bank N.A.
Trade Service Operations
Metro Park Plaza
499 Thornall Street
Edison, NJ 08837

Attn: Mr. Todd Ridley
4. Douglass Township
Board of Supervisors
1320 East Philadelphia Ave.
Gilbertsville, PA 19525
5. John Bradley, Esquire
Rhoda, Stoudt and Bradley
6th Floor the Birkshire
501 Washington Street
Box 877
Reading, PA 19603-0877

INTEROFFICE MEMORANDUM

Date: 28-Mar-1995 10:45am EST
From: Carol Sharp
SHARP.CAROL
Dept: Waste Management
Tel No: (215) 832-6191

TO: SE GWR Gov. Weekly Report WM/ECP SE (GWR.SE)

Subject: Boyertown Landfill

Boyertown Sanitary Disposal Co. Landfill -
Douglass Township, Montgomery County:

On Wednesday, March 22, 1995, Waste Management staff issued a Field Compliance Order to Mr. Warren K. Frame at his Contracting business located in Glenmoore, Chester County. The order outlined hazardous waste violations observed at the Boyertown Sanitary Disposal Co. Landfill located at 300 Merkel Road, Gilbertsville, Douglass Twp., Montgomery County. These violations included the failure to maintain two feet of freeboard in the hazardous waste surface impoundment used for the collection of raw, untreated, leachate. The violation resulted from Mr. Frame's failure to conduct sample analysis of the treated leachate and provide the results to the Berks Montgomery Municipal Authority who would then accept the treated leachate.

Mr. Frame and Boyertown Sanitary Disposal Company were ordered to achieve and maintain a minimum freeboard of two feet in the raw, untreated hazardous waste leachate surface impoundment within 24 hours of receipt of the Order. Although compliance with the Order was not achieved, an effort was made to comply which resulted in the achievement of a few inches of freeboard, thereby ceasing the spill. Further enforcement action is being considered in order to avoid the recurrence of this violation.



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

- Please note our new name -

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DEP

Suite 6010 Lee Park
555 North Lane
Conshohocken, PA 19428
August 30, 1995

Certified Return Receipt # 2408514059

(610) 832-6212

Fax: (610) 832-6259

Southeast Regional Office
Waste Management Program

NOTICE OF INTENT TO FORFEIT BOND

NOTICE OF VIOLATION

Mr. Warren Frame
President
Boyertown Sanitary Disposal Co., Inc.
1205 Pottstown Pike
Glenmoore, PA 19343

RE: Irrevocable Letter of Credit # 79478,
dated Sept. 3, 1987
Held by Boyertown Sanitary Disposal
Co., Inc.
PAD048603005
Boyertown Landfill
300 Merkel Road
Gilbertsville
Montgomery County

Dear Mr. Frame:

This letter serves as Notice of Violation and as Notice of
Intent to Forfeit the bond for the above referenced facility.

Department inspections have revealed that Boyertown Sanitary
Disposal Co., Inc. ('B.S.D.') is operating in violation of the Clean
Streams Law, Act of June 22, 1937, P.L. 1987, as amended, 35 P.S.



\$691.1 et seq., ("CSL"); the Pennsylvania Solid Waste Management Act, Act of July 7, 1980, P.L. 380, as amended, 35 P.S. \$6018.101, et. seq., ("SWMA"); the Rules and Regulations promulgated thereunder, and the conditions of Solid Waste Permit #100550 as follows:

A. B.S.D. failed to conduct groundwater monitoring at the Boyertown Landfill ("landfill") for the four quarters of 1993, four quarters of 1994, and the first two quarters of 1995; a total of 10 groundwater monitoring events which were not carried out. This is contrary to 25 Pa. Code §§ 265.92(e)(2), 273.284, 273.201(c), and condition number 2 of the Department's Solid Waste Management Permit No. 100550 amended 1/20/81.

B. Locking caps and identification numbers were observed to not be in place on two groundwater monitoring wells located on the landfill, contrary to 25 Pa. Code §§ 265.91(d), and 273.283(b)(4) and (6). In particular, an unlabelled and unlocked well was observed located on the north side of the landfill's leachate treatment plant, and monitoring well #9 was observed to have no lock.

S0022
DSE 2
3/17/95

C. Inspections conducted by the Department at the landfill on March 8, 17, 22, 23, April 3, 13, 25, May 2 and 4, 1995 revealed that B.S.D. failed to maintain two feet of freeboard in the raw leachate surface impoundment as a means to prevent any overtopping of the dike by overfilling, wave action or a storm. This is contrary to 25 Pa. Code §265.222.

S0024
DLP 1
03/17/95

D. An inspection conducted by the Department at the landfill on March 17, 1995 revealed:

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Pa. Code §§ 265.222, 101.2, 101.3, and constitutes unpermitted disposal of hazardous waste pursuant to 25 Pa. Code §270.1(a).

NEW 2
2.) B.S.D. failed to notify the Department of the hazardous waste leachate spill, contrary to 35 P.S. §§ 6018.403(b)(12), and 25 Pa. Code §§ 101.2 and 262.46 (a).

NEW 2
3.) Leachate seeps on the north slope of the landfill had flowed into stormwater swales which led to the onsite stormwater sedimentation pond, and to Minister Creek, a water of the Commonwealth. This is contrary to 25 Pa. Code §§ 273.272(a), 101.2, and 101.3, and constitute unpermitted disposal of hazardous waste pursuant to 25 Pa. Code §270.1(a).

E. A Department Order issued to B.S.D. on March 22, 1995, cited B.S.D.'s failure to maintain two feet of freeboard in the hazardous waste surface impoundment used for the collection of raw, untreated leachate thereby causing, and continuing to threaten to cause, an unpermitted discharge of leachate onto and into the surface of the ground and waters of the Commonwealth, a violation of 25 Pa. Code §§265.222, 101.2, 101.3(a), and 35 PS §§6018.401(a). This condition constitutes a public nuisance pursuant to 35 PS § 6018.601, and constitutes unlawful conduct pursuant to 35 PS §6018.403 (b)(9), 6018.610 (1), (2), (4) and (9), and 35 PS §691.611.

F. The Department's March 22 Order required B.S.D. to achieve and maintain a minimum freeboard of two feet in the leachate surface impoundment within 24 hours of service of the order. Department inspections conducted on March 23, April 3, April 13, April 19, April 25, May 2, and May 4, 1995 revealed that compliance with the Department's March 22 Order had not been attained. Two feet of freeboard was not attained in the raw leachate lagoon. This is contrary to 35 P.S. § 6018.603.

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3. B.S.D. should prepare and submit a written closure plan which addresses the following:

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- b. Closure of the raw leachate surface impoundment in conjunction with the implementation of the use of storage tanks for the pretreatment storage of raw leachate,
- c. An evaluation of the adequacy and effectiveness of the existing gas management system, and
- d. An evaluation of the adequacy and effectiveness of the existing stormwater management system.

4. B.S.D. should ensure that all monitoring wells located at the landfill are fitted with locked caps and identification numbers.

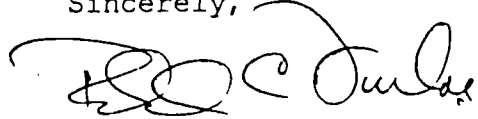
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Unless the violations set forth above are corrected within thirty (30) days, the Department may take action to declare a forfeiture of the bond under the provisions of Section 505(d) of the SWMA. Declaration of Bond Forfeiture may cause suspension of your Waste Management permit and may cause other existing permits or certifications to be suspended or revoked.

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If you have any questions, please contact me at the number above.

Sincerely,

A handwritten signature in black ink, appearing to read "R. C. Furlan", with a large, stylized flourish at the end.

Ronald C. Furlan, P.E.
Regional Solid Waste Manager
Southeast Regional Office

cc: Division of Enforcement, C.O.
Certif., Licensing, and Bonding
MidLantic Bank
Kenneth Gelburd, Esquire
Mr. Bruce Beitler
Mr. Robert France
Mr. Robert Bauer
Douglass Township
John Bradley, Esquire